

*IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION AT KNOXVILLE*

IN RE:

NANCY TURNER WILSON

Case No. **3:17-bk-32511-SHB**
Chapter 7

Debtor.

TRUSTEE'S APPLICATION TO EMPLOY COUNSEL NUNC PRO TUNC

Comes Michael H. Fitzpatrick, Trustee, pursuant to 11 U.S.C. §327(a), Fed. R. Bankr. P. 2014 and E.D. Tenn. LBR 9013-1(g)(1)(xx), E.D. Tenn. LBR 2014-1, and moves the Court for authority to employ counsel as follows:

1. The Debtor filed a voluntary Chapter 13 on August 11, 2017. The case was converted to a Chapter 7 upon motion of the Debtor on December 20, 2017. Michael Fitzpatrick was appointed as Chapter 7 trustee, and continues to serve in that capacity.
2. The Trustee wishes to employ an attorney to represent the estate with respect to selling a 1/6 interest in real property that belongs to the estate, and to assist with all other needs of the estate.
3. The Trustee seeks authorization to employ Ryan E. Jarrard and the firm of Quist, Fitzpatrick & Jarrard, PLLC. The attorneys do not hold any interest adverse to the estate and are disinterested persons within the meaning of 11 U.S.C. §101(14).
4. The Trustee proposes to employ said attorneys at an hourly rate, as part of counsel's affidavit, attached hereto and incorporated herein by reference, and such expenses as may be allowed by the Court in accordance with the standard promulgated by the U.S. Trustee's Office, with the total amount of the compensation and expenses to be fixed and determined by the Court upon proper application at the conclusion of the attorneys' services.

5. The Trustee is entitled to employ an attorney, with Court approval, pursuant to 11 U.S.C. §327(a).

6. There is no application for a post-petition retainer. There are no actual or potential conflicts of interest. There are no other facts which would preclude retention of counsel.

WHEREFORE, the undersigned prays that he be authorized to employ the aforesaid attorney under the terms and conditions set forth, *nunc pro tunc* to the date this application is filed.

Respectfully submitted,

/s/ Michael H. Fitzpatrick

Michael H. Fitzpatrick, Trustee

BPR No. 006033

Quist, Fitzpatrick & Jarrard, PLLC

2121 First Tennessee Plaza

800 South Gay Street

Knoxville, TN 37929-9711

(865) 524-1873 ext. 222

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/s/ Ryan E. Jarrard

Ryan E. Jarrard, Esq.

BPR No. 024525

Attorney for Michael H. Fitzpatrick, Trustee

Quist, Fitzpatrick & Jarrard, PLLC

2121 First Tennessee Plaza

800 South Gay Street

Knoxville, TN 37929-9711

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Trustee's Application to Employ Counsel, Affidavit of Professional Person and proposed Order have been served upon the indicated parties by placing a copy thereof in the U.S. Mail, first class postage prepaid, via email or ECF this January 24, 2018:

Tiffany DiIorio
800 Market Street, Suite 114
Howard J. Baker Jr. US Courthouse
Knoxville, TN 37902

All Parties in Interest on the attached list

/s/ Michael H. Fitzpatrick

ATTORNEY